

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Dean Langford and Nancy Langford,
husband and wife,

Plaintiffs,

v.

Zimmer, Inc. and Zimmer Holdings, Inc.,

Defendants.

Case No: 03-12245-RCL

**PLAINTIFFS' MOTION TO
AMEND THEIR FIRST
AMENDED COMPLAINT**

Plaintiffs respectfully seek this Court's permission to file and serve Plaintiffs' Second Amended Complaint (1) to add Zimmer hip products, besides the Centralign, which were implanted in Mr. Langford's left hip; (2) to add a claim for unfair or deceptive acts or practices; and (3) to correct some typographical errors in Plaintiffs' First Amended Complaint.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request oral argument on their motion.

Dated this 12th day of July, 2004.

Respectfully submitted,

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